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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

10 BERNSTEIN & POISSON, a Nevada corporation;
Case No.: 2:24-cv-01177-APG-EJY

11 Plaintiffs,
12 vs.

**STIPULATION AND ORDER TO AMEND
COMPLAINT**

13 Cynthia Standmore, an individual;
14 J S F Incorporated DBA Chiropractic Physicians
of Las Vegas;
15 Cameron Medical, Inc.;
16 Coppel Medical Enterprise LLC DBA Nevada
Comprehensive Pain Centers;
17 United States Department of Health and Human
Services and its delegate agency, Centers for
18 Medicare and Medicaid Service;
State of Nevada, Department of Health and
19 Human Services;
Golden Pear Funding II, LLC, a New York limited
20 liability company;
Preferred Capital Funding – Nevada, LLC;
21
22 DOES 1 through 100; ROE CORPORATIONS
101 through 200,

23 Defendants.

24 The parties agree and hereby stipulate to allow Plaintiff to Amend the Complaint on file
25 to substitute Defendant, United States Department of the Treasury with United States Department
26 of Health and Human Services and its delegate agency, Centers for Medicare and Medicaid Service
27 as the correct entity name pursuant to the July 29, 2024 Stipulation to Substitute Parties. Further,
28 to modify the Complaint to include the amounts of the liens for Preferred Capital Funding –

Nevada, LLC and Golden Pear Funding II, LLC. Leave should be freely given to allow such amendments as they do not prejudice any party and seek to clarify and otherwise confirm the complaint to the facts in this matter. A proposed Amended Complaint is attached as Exhibit 1.

Counsel further stipulates to allow the attached Amended Complaint to be filed with the Court. The parties shall have 20 days from the filing of the Amended Complaints to file their Answers.

Submitted by:

DATED: AUGUST 15, 2024

/s/ Amber N. King
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Attorneys for Plaintiff

DATED: AUGUST 15, 2024

/s/ Lindsay Ager
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DATED: AUGUST 15, 2024

/s/ James G. Christensen
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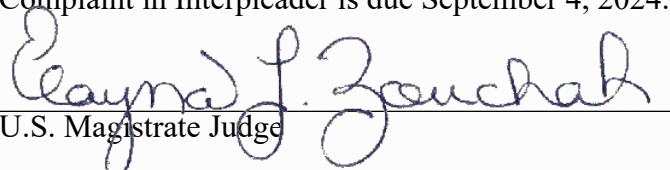
DATED: AUGUST 15, 2024

/s/ Christopher R. Groble
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*Attorneys for Preferred Capital Funding-
Nevada, LLC*

IT IS HEREBY ORDERED that the Stipulation and Order to Amend Complaint (ECF No. 12) is GRANTED.

IT IS FURTHER ORDERED that Plaintiff must file its Amended Complaint in Interpleader on the docket in this case.

IT IS FURTHER ORDERED that the Answer to the Amended Complaint in Interpleader is due September 4, 2024.


U.S. Magistrate Judge

Date: August 15, 2024

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